

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

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RM-1141

In Re:

Lindsey Watson

Case No. 23-18441ABA

Judge:

Chapter 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

X CREDITOR'S MOTION or CERTIFICATION OF DEFAULT

TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following **(choose one)**:

1. _____ Motion for Relief from the Automatic Stay filed by Lakeview Loan Servicing, LLC., creditor. A hearing has been scheduled for _____, at 10:00 a.m.

OR

_____ Motion to Dismiss filed by the Standing Chapter 13 Trustee. A hearing has been scheduled for _____ at _____ a.m.

OR

X Certification of Default filed by Lakeview Loan Servicing, creditor. I am requesting that a hearing be scheduled on this matter.

OR

_____ Certification of Default filed by Standing Chapter 13 Trustee. I am requesting that a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (**choose one**):

_____ Payments have been made in the amount of \$_____, but have not been accounted for. Documentation in support is attached hereto.

OR

_____ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

OR

X Other:

The debtor has not yet provided me with her signed response which is due today. However, she personally advised me of the following and her intention to cure the mortgage arrears as follows:

She paid \$1,200 on 1/30/2025 and \$1,000 on 2/3/2025. The total arrears balance after said payments is \$2,345.16. She advised me that she will cure the arrears by making a \$1,173 on 2/28/2025 and 3/31/2025. Additionally, she advised me that she will make March's payment on a timely basis. I respectfully request that the court allows the debtor to cure the arrears and deny the movant's motion for relief.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 2/3/2025

/s/Robert Manchel, Esq.
Robert Manchel, Debtor's Attorney